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SPEARS & IMES UP

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August 24, 2023

Subject to reasonable restrictions of Pretrial Services, Mr. Brown may travel to the Northern District of New York on August 27 and 28, 2023 and his bail conditions are modified through November 30, 2023 to include travel to the District of New Jersey.

SO ORDERED. Dated: 8/24/2023

P. Kevin Castel
United States District Judge

The Honorable P. Kevin Castel

BY ECF

United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

Re:

United States v. Andrew Brown, S1 20 Cr. 470 (PKC)

Dear Judge Castel:

We respectfully write on behalf of Andrew Brown to request that the restrictions on his travel be temporarily modified to permit travel to the Northern District of New York and to the District of New Jersey, as described below. The Pretrial Services Officer supervising Mr. Brown and the Government have no objection to these proposed modifications.

First, we respectfully request that Mr. Brown be allowed to travel to the Northern District of New York on August 27 and to return the following day, in order to bring his son back to college in Cortland, New York.

Second, we respectfully request that Mr. Brown be permitted to travel between his home and his sister's home in New Jersey over the course of the next six weeks. Mr. Brown's father is undergoing surgery and follow-up procedures during this period and will be cared for by both Mr. Brown and Mr. Brown's sister. Mr. Brown hopes to be able to travel to and from New Jersey in order to assist in his father's care.

Thank you for your consideration of these requests.

Respectfully submitted,

<u>/s Reed M.</u> Keefe

Max Nicholas Reed M. Keefe Attorneys for Andrew Brown

cc: All Counsel via ECF